

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**
Baltimore Division

IN RE:
KERYNN D POOLE
Fka KERYNN D HUGGINS
Aka KERI D POOLE
Debtor

Case No. 24-20570-DER

Chapter 13

US BANK TRUST NATIONAL ASSOCIATION, NOT IN
ITS INDIVIDUAL CAPACITY BUT SOLELY AS OWNER
TRUSTEE FOR VRMTG ASSET TRUST
Movant

v.
KERYNN D POOLE
Fka KERYNN D HUGGINS
Aka KERI D POOLE
Debtor/Respondent
and
JOHN D. POOLE
Co-Debtor/Co-Respondent
and
REBECCA A. HERR
Trustee/Respondent

NOTICE OF MOTION FOR RELIEF FROM STAY AND HEARING THEREON

US Bank Trust National Association, not in its individual capacity but solely as owner trustee for VRMTG Asset Trust has filed papers with the court seeking relief from the automatic stay of 11 U.S.C. §362(a) to enable it to proceed to foreclose on the property located at:

127 Duval Lane, Edgewater, MD 21037-1610

Your rights may be affected. You should read these papers carefully and discuss them with your lawyer, if you have one in this bankruptcy case. (If you do not have a lawyer, you may wish to consult one.)

If you do not want the court to grant the motion for relief from automatic stay, or if you want the court to consider your views on the motion, then by:

March 31, 2025

you or your lawyer must file a written response with the Clerk of the Bankruptcy Court explaining your position and mail a copy to:

Eric VandeLinde, Esq.
6003 Executive Blvd, Suite 101
Rockville, MD 20852

Rebecca A. Herr, Trustee
185 Admiral Cochrane Dr., Suite 240
Annapolis, MD 21401

Diana L. Klein, Esq.
2450 Riva Road
Annapolis, MD 21401

Kerynn D Poole fka Kerynn D Huggins aka Keri D Poole
127 Duval Lane
Edgewater, MD 21037

John D. Poole
127 Duval Ln
Edgewater, MD 21037-1610

If you mail rather than deliver your response to the Clerk of the Bankruptcy Court for filing, you must mail it early enough so that the court will receive it by the date stated above.

The hearing is scheduled for April 14, 2025, at 01:30 PM, in Courtroom 9-D, in United States Bankruptcy Court, 101 W. Lombard Street, Baltimore, MD 21201.

IF YOU OR YOUR LAWYER DO NOT TAKE THESE STEPS BY THE DEADLINE, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY GRANT OR OTHERWISE DISPOSE OF THE MOTION BEFORE THE SCHEDULED HEARING DATE.

Respectfully Submitted,

Dated: 3/17/2025

/s/ Eric VandeLinde

Eric VandeLinde, Esq., MD Fed. Bar No. 21205
BWW Law Group, LLC
6003 Executive Blvd, Suite 101
Rockville, MD 20852
301-961-6555; 301-961-6545 (facsimile)
bankruptcy@bww-law.com
Attorney for the Movant

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of March, 2025, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the foregoing Notice of Motion for Relief from Stay and Hearing Thereon will be served electronically by the Court's CM/ECF system on the following:

Rebecca A. Herr, Trustee

Diana L. Klein, Attorney

I hereby further certify that on this 17th day of March, 2025, a copy of the foregoing Notice of Motion for Relief from Stay and Hearing Thereon was also mailed first class mail, postage prepaid, to:

Kerynn D Poole fka Kerynn D Huggins aka Keri D Poole
127 Duval Lane
Edgewater, MD 21037

John D. Poole
127 Duval Ln
Edgewater, MD 21037-1610

/s/ Eric VandeLinde

Eric VandeLinde, Esq.